

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:21-cr-00191-SI

v.

SUPERSEDING INFORMATION

TRACY LYNN MOLINA,

41 C.F.R. § 102-74.380

41 C.F.R. § 102-74.385

Defendant.

41 C.F.R. § 102-74.390(c)

THE UNITED STATES ATTORNEY CHARGES:

**COUNT 1
(Disorderly Conduct on Federal Property)
(41 C.F.R. § 102-74.390(c))**

On or about October 20, 2020, in the District of Oregon, defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and did exhibit disorderly conduct that unreasonably

obstructed the usual use of entrances and parking lots, and impeded and disrupted Government employees from the performance of their official duties;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.390(c), a class C misdemeanor.

COUNT 2
(Failing to Comply with a Lawful Order)
(41 C.F.R. § 102-74.385)

On or about October 20, 2020, in the District of Oregon, the defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and fail to comply with the lawful direction of federal police officers and other authorized individuals;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.385, a class C misdemeanor.

COUNT 3
(Disorderly Conduct on Federal Property)
(41 C.F.R. § 102-74.390(c))

On or about October 29, 2020, in the District of Oregon, defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and did exhibit disorderly conduct that unreasonably obstructed the usual use of entrances and parking lots, and impeded and disrupted Government employees from the performance of their official duties;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.390(c), a class C misdemeanor.

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COUNT 4
(Failing to Comply with a Lawful Order)
(41 C.F.R. § 102-74.385)

On or about October 29, 2020, in the District of Oregon, the defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and fail to comply with the lawful direction of federal police officers and other authorized individuals;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.385, a class C misdemeanor.

COUNT 5
(Disorderly Conduct on Federal Property)
(41 C.F.R. § 102-74.390(c))

On or about December 6, 2020, in the District of Oregon, defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and did exhibit disorderly conduct that unreasonably obstructed the usual use of entrances and parking lots, and impeded and disrupted Government employees from the performance of their official duties;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.390(c), a class C misdemeanor.

COUNT 6
(Failing to Comply with a Lawful Order)
(41 C.F.R. § 102-74.385)

On or about December 6, 2020, in the District of Oregon, the defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and fail to comply with the lawful direction of federal police officers and other authorized individuals;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.385, a class C misdemeanor.

COUNT 7
(Failing to Comply with a Lawful Order)
(41 C.F.R. § 102-74.385)

On or about January 21, 2021, in the District of Oregon, the defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and fail to comply with the lawful direction of federal police officers and other authorized individuals;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.385, a class C misdemeanor.

COUNT 8
(Preservation of Property)
(41 C.F.R. § 102-74.380)

On or about February 27, 2021 in the District of Oregon, the defendant **TRACY LYNN MOLINA** did willfully damage and destroy federal property; to wit: a security camera at the United States Citizenship and Immigration Services, located at 1455 NW Overton St in Portland, Oregon;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.380, a class C misdemeanor.

COUNT 9
(Disorderly Conduct on Federal Property)
(41 C.F.R. § 102-74.390(c))

On or about May 5, 2021, in the District of Oregon, defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and did exhibit disorderly conduct that unreasonably

obstructed the usual use of entrances and parking lots, and impeded and disrupted Government employees from the performance of their official duties;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.390(c), a class C misdemeanor.

COUNT 10
(Failing to Comply with a Lawful Order)
(41 C.F.R. § 102-74.385)

On or about May 5, 2021, in the District of Oregon, the defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and fail to comply with the lawful direction of federal police officers and other authorized individuals;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.385, a class C misdemeanor.

COUNT 11
(Disorderly Conduct on Federal Property)
(41 C.F.R. § 102-74.390(c))

On or about May 31, 2021, in the District of Oregon, defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and did exhibit disorderly conduct that unreasonably obstructed the usual use of entrances and parking lots, and impeded and disrupted Government employees from the performance of their official duties;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.390(c), a class C misdemeanor.

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COUNT 12
(Failing to Comply with a Lawful Order)
(41 C.F.R. § 102-74.385)

On or about May 31, 2021, in the District of Oregon, the defendant **TRACY LYNN MOLINA** did willfully enter in and on federal property, to wit: the grounds of the Immigration and Customs Enforcement building, and fail to comply with the lawful direction of federal police officers and other authorized individuals;

In violation of Title 40, United States Code, Section 1315 and 41 Code of Federal Regulations, Section 102-74.385, a class C misdemeanor.

Dated: June 10, 2021

Respectfully submitted,

SCOTT ERIK ASPHAUG
Acting United States Attorney

GREGORY
NYHUS
GREGORY R. NYHUS, OSB #913841
Assistant United States Attorney

Digitally signed by
GREGORY NYHUS
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